

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW HAMPSHIRE**

HUMAN RIGHTS DEFENSE CENTER,

Plaintiff,

Case No.: 1:22-cv-00091-LM

v.

BOARD OF COUNTY COMMISSIONERS FOR
STRAFFORD COUNTY, NEW HAMPSHIRE;
et al.

Defendants.

PARTIES' JOINT PROPOSED SCHEDULING ORDER

Now come the Parties, through their respective counsel, and submit the following
Proposed Order for the scheduling of the preliminary injunction hearing and other matters.

Hearing on Preliminary Injunction:

The parties propose the following dates for the evidentiary hearing on Plaintiff's Motion
for Preliminary Injunction. It is expected that the hearing will take a full day.

Week of July 5

Bond/Security Requirement (Fed. R. Civ. P. 65(c)):

Defendants waive the bond requirement.

Discovery Schedule:

The parties propose to file a Joint Discovery Plan 30 days after the hearing on Plaintiff's
Preliminary Injunction.

Dated: May 11, 2022

Respectfully Submitted,

Human Rights Defense Center
By Its Attorneys,
Bernstein Shur, PA

/s/ Edward Sackman
Edward J. Sackman
NH Bar No. 19586
Bernstein Shur, PA
670 N. Commercial Street, Suite 108
PO Box 1120
Manchester, NH 03105

Dated: May 11, 2022

Respectfully Submitted,

Board of County Commissioners for Strafford County NH
Raymond Bower
Christopher Brackett
By Their Attorneys,
Friedman Feeney, PLLC

/s/ Christine Friedman
Christine Friedman
NH Bar No. 8780
Friedman Feeney, PLLC
95 N. State Street, Suite 5
Concord, NH 03301
chris@friedmanfeeney.com
603-736-7683

\